

State Water Resources Control Board
Division of Drinking Water

March 29, 2017

Mr. Thomas Esqueda, Director
City of Fresno - Department of Public Utilities
2600 Fresno Street, Room 4019
Fresno, CA 93721

Dear Mr. Esqueda,

**RE: USEPA Lead and Copper Rule Review of the City of Fresno's Public Water System –
Response to City Proposal for Implementing Recommendations – March 2017**

The purpose of this letter is to address the City of Fresno's (City) response to the recommendations included in a letter dated February 17, 2017, from the Division of Drinking Water (Division), enclosed. The recommendations were included in a report issued by the United States Environmental Protection Agency – Region IX related to EPA's review of the City of Fresno's (City) Lead and Copper Rule (LCR) compliance information. Specifically, the USEPA – Region IX issued a letter to Tom Howard, State Water Resources Control Board's Executive Director, on January 19, 2017, and included a copy of the report that summarized the findings and recommendations resulting from an exhaustive review of the City's LCR compliance information. The Division recommended that the City implement the recommendations contained in the USEPA Report.

In response to the recommendations contained in the February 17, 2017, letter, the City provided a response to the Division dated February 28, 2017, enclosed. The Division has reviewed the City's response and met with you on March 27, 2017, to discuss the details of the recommendations. The following clarifications are provided to ensure full compliance with implementing the recommendations contained in the letter to the City and the USEPA Report.

1. **Revise the lead and copper tap sampling strategy to identify more representative samples of water quality in the distribution system and submit to the Division by March 19, 2017.** The City requested the deadline for identifying the lead and copper distribution system monitoring sites to June 30, 2017. There is no objection to extending the deadline to June 30, 2017. Per the meeting with you, the City is in the process of identifying the monitoring locations and plans to submit an exhaustive list of available sample sites mapped on a City distribution system map in May 2017, for consideration by the Division. From the exhaustive list, the City will work with the Division to narrow the exhaustive list to the selected sites with an emphasis being placed on ensuring that the sample sites that are selected are as representative as possible. The final sampling locations, a map of the monitoring locations and documentation used to identify the sampling locations will be provided to the Division by June 30, 2017.

2. **The City should return to initial lead and copper tap monitoring frequency.** The City requested that the deadline for completing the first round of initial monitoring be extended from June 30, 2017, to September 30, 2017. The Division has no objection to extending the deadline for completing the first round of initial lead and copper tap monitoring to September 30, 2017. The City will remain on the initial monitoring frequency for at least two 6 month periods. However, given that the City is in the process of constructing a new surface water treatment plant (SWTP) in southeast Fresno, it is likely that the City will continue on the 6 month monitoring frequency for at least four periods prior to requesting a reduction in the number of sample sites and the monitoring frequency.
3. **The City should conduct initial water quality parameter (WQP) monitoring at entry points and within the distribution system.** The City agreed to conduct initial WQP monitoring at the entry points to the distribution system from each of the City's surface water treatment plants and active groundwater wells. The City plans to submit the results from the initial WQP monitoring by October 10, 2017. The second proposed a second round of initial WQP monitoring at each of the SWTPs and the active groundwater wells with results to be submitted by June 30, 2018. The Division will evaluate the initial round of WQP monitoring and determine whether or not the second round of initial WQP monitoring is necessary.

After the initial WQP monitoring is completed, the City proposed annual WQP monitoring at the each entry point and from a reduced number of sample tap locations within the distribution system. Per the Lead and Copper Rule, the City is required to conduct WQP monitoring at each entry point to the distribution system, where corrosion control treatment has been installed, a minimum of every two weeks. **As such, the City is required to ensure that WQP monitoring at each entry point to the distribution system is completed every two weeks. This requirement applies to each of the groundwater wells where corrosion control treatment has been installed as well as each of the surface water treatment plants that are online.** The reduction in the WQP monitoring frequency cannot be granted.

The WQP monitoring at each of the entry points will include pH, alkalinity dosage and concentration (if alkalinity is adjusted as part of CCT), and phosphate dosage and concentration (if a corrosion inhibitor containing phosphate is used as part of CCT) a minimum of once every two weeks. Ongoing WQP monitoring at the tap monitoring locations should consist of two samples for pH, alkalinity, orthophosphate, and calcium at the reduced number of tap locations (10 locations) at least every 6 months. The Division will work with the City to ensure that there is an adequate number of distribution system monitoring locations where WQP monitoring is being completed to ensure that the CCT is operating properly and being maintained.

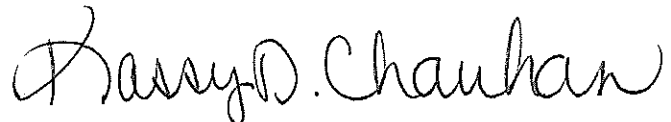
4. **The Division of Drinking Water will be establishing water quality parameters for the Northeast Surface Water Treatment Plant.** No additional information.
5. **The City will be required to initiate corrosion control requirements if the System fails to be deemed optimized for corrosion control.** No additional information.

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Lastly, the USEPA prepared a letter dated March 9, 2017, enclosed, modifying the initial EPA finding regarding the Division's determination that the City was optimized for corrosion control. The letter from USEPA was provided following the submission of additional source data from the Division to support the Division's original finding in 1996 that the City's system was optimized for corrosion control. Based on the new information, EPA concluded that the City water system was properly deemed optimized for corrosion control treatment as originally established in the March 4, 1996 letter from DDW (then California Department of Health Services). This conclusion did not change any of the other conclusions by EPA.

If you require any further information or need assistance, please contact me at (559) 447-3316.

Sincerely,

A handwritten signature in black ink that reads "Kassy D. Chauhan". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Kassy D. Chauhan, P.E.
Senior Sanitary Engineer
Merced District
Central California Section
SOUTHERN CALIFORNIA BRANCH
DRINKING WATER FIELD OPERATIONS

Enclosures

cc: Carl L. Carlucci, P.E. – Division of Drinking Water
Kurt Souza, P.E. – Division of Drinking Water
Darrin Polhemus, P.E. – Division of Drinking Water
Luis Garcia-Bakarich – USEPA – Region IX
Mr. Wayne Fox - Fresno County Environmental Health Department